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Balenciaga America, Inc., Balenciaga S.A.,
Bottega Veneta International S.a.r.l., Bottega Veneta Inc.,
Luxury Goods International (L.G.I.) and Yves Saint Laurent America, Inc.*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GUCCI AMERICA, INC., BALENCIAGA :
AMERICA, INC., BALENCIAGA S.A., BOTTEGA :
VENATA INTERNATIONAL S.A.R.L., :
BOTTEGA VENETA INC., LUXURY GOODS :
INTERNATIONAL (L.G.I.) S.A. and YVES SAINT :
LAURENT AMERICA, INC. :
Plaintiffs, :
-against- :
WEIXING LI and LIJUN XU a/k/a JACK LONDON, :
all doing business as REDTAGPARTY, :
MYLUXURYBAGS.COM, :
XPRESSDESIGNERS.COM, :
XPRESSDESIGNER.NET, and DESIGNER :
HANDBAGS; ABC COMPANIES; :
and JOHN DOES, :
Defendants. :
-----X

2010 Civ. _____

**DECLARATION OF ROBERT L.
WEIGEL**

Robert L. Weigel hereby declares as follows:

1. I am a member of the bar of this Court and a partner of the law firm of Gibson, Dunn & Crutcher LLP, counsel to Gucci America, Inc. ("Gucci"), Balenciaga America, Inc. and

Balenciaga, S.A. (together “Balenciaga”), Bottega Veneta International S.a.r.l. and Bottega Veneta, Inc. (“Bottega Veneta”), Luxury Goods International (L.G.I.) S.A. and Yves Saint Laurent America, Inc. (“YSL”) (collectively, “Plaintiffs”). I submit this declaration in support of Plaintiffs’ application for a temporary restraining order and preliminary injunction.

2. Attached as Exhibit 1 is a true and correct copy of the Temporary Restraining Order and Order to Show Cause entered in *Gucci America, Inc., et al. v. MyReplicaHandbag.com, et al.*, 07 Civ. 2438 (JGK) (S.D.N.Y. March 27, 2007).

3. Attached as Exhibit 2 is a true and correct copy of the Temporary Restraining Order and Order to Show Cause entered in *Gucci America, Inc., et al. v. Laurette Company, Inc., et al.*, 08 Civ. 5065 (LAK) (S.D.N.Y. June 3, 2008).

4. Attached as Exhibit 3 is a true and correct copy of the Preliminary Injunction and Order Authorizing Expedited Discovery entered in *Gucci America Inc., et al. v. Curveal Fashion, et al.*, 09 Civ. 8458 (RJS) (S.D.N.Y. Oct. 23, 2009).

5. Attached as Exhibit 4 is a true and correct copy of the Preliminary Injunction entered in *Balenciaga America Inc., et al. v. Dollinger, et al.*, 2010 Civ. 2912 (LTS) (S.D.N.Y. May 17, 2010).

6. Attached as Exhibit 5 is a true and correct copy of the Preliminary Injunction and Order Authorizing Expedited Discovery entered in *Gucci America Inc., et al. v. Bagsmerchant, LLC, et al.*, 2010 Civ. 2911 (DAB) (S.D.N.Y. May 23, 2010).

7. Attached as Exhibit 6 is a true and correct copy of the Court’s judgment and damages award of \$4.3 million in *Gucci America, Inc. v. MyReplicaHandbag.com*, 07 Civ. 2438 (JGK) (March 4, 2008).

8. Attached as Exhibit 7 is a true and correct copy of the \$2 million consent judgment obtained from Defendants in *Gucci America, Inc. v. HGL Enterprises*, 07 Civ. 5569 (RMB) (S.D.N.Y.) (Nov. 28, 2007).

9. Attached as Exhibit 8 is a true and correct copy of the \$5.2 million consent judgment obtained from Defendants in *Gucci America, Inc. v. Laurette Company, Inc.*, 08 Civ. 5065 (LAK) (S.D.N.Y.) (Dec. 15, 2008).

10. Attached as Exhibit 9 is a true and correct copy of the Court's judgment and damages award of \$13.7 million obtained in *Gucci America, Inc. et al. v. Curveal Fashion et al.*, No. 09 Civ. 8458 (RJS) (January 20, 2010).

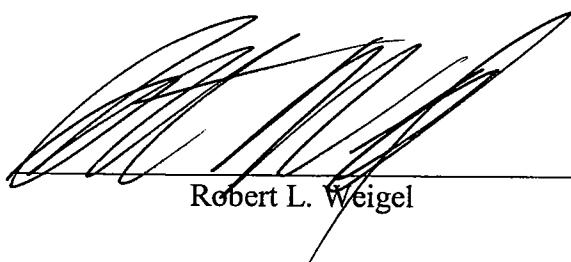
11. Attached as Exhibit 10 is a true and correct copy of the Arbitration Panel Decision by the World Intellectual Property Organization's Arbitration and Mediation Center in the matter of *Balenciaga v. Treasure Enterprises Ltd.*, Case No. D2009-0660, dated July 18, 2009.

12. Attached as Exhibit 11 is a true and correct copy of remarks of President George W. Bush upon signing the Stop Counterfeiting in Manufactured Goods Act, as posted on the White House website, <<http://www.whitehouse.gov/news/releases/2006/03/print/20060316-7.html>>, as of April 12, 2007.

13. No previous application has been made for the relief sought herein.

I hereby declare, under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
June 24, 2010



Robert L. Weigel